

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

CHARLENE CARTER,

Plaintiff,

v.

**SOUTHWEST AIRLINES CO., AND
TRANSPORT WORKERS UNION
OF AMERICA LOCAL 556,**

Local 556s.

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Civil Action No. 03:17-cv-02278-X

**DEFENDANT TWU LOCAL 556'S UNOPPOSED MOTION TO
EXTEND THE DISPOSITIVE MOTION DEADLINE**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant Transport Workers Union of America Local 556 ("Defendant" or "TWU Local 556"), by and through their undersigned counsel, requests on behalf of all parties, that the Court grant a one week extension to comply with the Court's dispositive motion deadline (Doc. 154), extending the deadline from **September 2, 2021 to September 9, 2021**. In support of this motion, Defendant states as follows:

1. Defendant TWU Local 556 requests this extension due to family medical related reasons.
2. On August 31, 2021, Counsel fell sick with an unidentified illness. Out of an abundance of caution, he quarantined himself from his family. Counsel was able to rejoin his family the following evening after a negative rapid Covid-19 test and diminished symptoms.
3. Counsel is still ill and not conducting business as of the filing of this motion.
4. Counsel's for all parties conferred via email on September 1-2, and came to the agreement that the deadline should be extended for all parties.

5. The following demonstrates there is good cause to grant the extension. This motion is not filed for the purpose of delay, but so that justice and safety may be done.
6. For the foregoing reasons, the Parties require and request additional time to extend the deadline for filing dispositive motions.

Respectfully submitted,

Date: September 2, 2021

/s/ Adam S. Greenfield

Adam S. Greenfield
Texas Bar No. 24075494
agreenfield@candglegal.com
*Board Certified in Labor & Employment Law
by the Texas Board of Legal Specialization*

Edward Cloutman, III – Of Counsel
State Bar No. 04411000
crawfishll@prodigy.net

Cloutman & Greenfield, PLLC
3301 Elm Street
Dallas, Texas 75226
214.939.9224
214.939.9229 FAX

COUNSELS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I undersigned hereby certifies that on September 2, 2021, a true and correct copy of the foregoing document was served via the ECF notification on Defendant's counsel of record.

/s/ Adam S. Greenfield
Adam S. Greenfield

CERTIFICATE OF CONFERENCE

Defendant's counsel, Adam S. Greenfield, conferred via email with Plaintiff's counsel, Matthew Gilliam, and Defendant Southwest Airlines counsel, Paulo McKeeby, on September 1-2, 2021. The parties agreed to extend the deadline for all parties.

/s/ Adam S. Greenfield

Adam S. Greenfield